

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -  
WAIKATO AND WAIPA RIVER CATCHMENTS

**Submission Form**

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

**On:** The Waikato Regional Councils proposed Waikato Regional Plan Change 1 -  
Waikato and Waipa River Catchments

**To:** Waikato Regional Council  
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*Complete the following*

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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

**I wish to be heard in support of this submission.**

**If others make similar submissions, I would consider presenting a joint case with them at the hearing.**

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# WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

## Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

We live and farm on Mapara South Road, Te Kuiti, on 56ha – it involves 200 ewes, 50 yearling cattle and 20 2 year old cattle. We purchased this block nearly 5 years ago in June 2012.

At that stage it had a very poor fertiliser history – the pH levels were higher than the Olsen P levels! We have improved its productivity with re starting the fertiliser applications, further subdivision, increased water reticulation and improved pastures.

It consists of 12ha of silt river flats next to the Mapara Stream/River, 25ha northerly facing hill country, and 13ha of rolling country – mostly as a terrace above the hill country. The balance is trees, bush and a few other areas.

The Mapara River is fully fenced and with the help of the WRC has had the old willows removed in our property, and replaced Matsadana Willows to help the flow of the river and reduce flooding of the Mapara South Road.

While the flats can look great in the summer they can be very wet in the winter. I overcome this by farming very light yearling cattle (150kg) through the winter and sometimes send some of these off farm for the winter. I also have a winter crop that grazes the 2 year cattle for the late winter period. The hill country has a number of rocky outcrops so it is just farmed with ewes and lambs except for the odd paddock (of 6 in this area) in summer which has either calves or lighter 15 month cattle. This also protects the small flows of water that come from some of the rock areas in the winter and spring.

I have the river flats on a new grass rotation – I did cultivate in 8ha of plantain and clover in 2012 but now this involves direct drilling grass to grass. On the rolling country I cultivate in approx.. 2ha of Kale that then provides summer and then winter grazing. This last year I followed this with another summer crop (instead of spring sowing the new grass) which then goes into new grass. This is predominantly completed with light discing (with very old disc's!), some harrowing and then broadcasting the seed on.

While our property is in the West Coast Catchment prior to 2012 I was an Agricultural Consultant primarily working with Sheep and Beef farmers in the King Country, Waikato and Taupo areas. I have just returned to the consultancy industry in 2017.

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## WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

Overall I support the general vision of the Plan which is to improve the quality of water in the waterways in the Waipa/Waikato Catchments. However I would make the following key points:

- The plan protects the hydro (and geo-thermal) industry and the activities they undertake on the Waikato River. While I agree this is needed for national good and they are a great source of recreational activity (of which I am a user) by effectively stopping the flow of the River this causes challenges to the water quality of the Waikato River in these hydro lake areas.
- Because of the soil type not all rivers are going to pristine clear and appear swimmable. (Although not in the catchment our river is a case in point – it is a silty river. During rain lots of clear water is flowing into the stream off farmland into a very silty river. Our silt river flats were not formed after the hill country was cleared for farming – that all happened while the hills were in trees. There will be other rivers like this in the Waikato/Waipā catchments.
- The plan proposes enforcement of stock exclusions across all waterways, capping nitrogen, having comprehensive Farm Environmental Plans and for farming to be a consented activity. I believe this a big scatter gun approach and is doing too much too soon without addressing the hot spot areas. There should be a one or the other approach – not everything
- PC1 should link more to the National Rules – e.g. the National Water Policy statement. NZ is a small country and farmers do move around – there needs to be consistency across the country with regard to these types of rules. The Regional Councils need to sort this out, PC1 should reflect this.

With regard to specific parts of the PC1 proposal (where my numbering comes from the "Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchments" document):

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Objective 1	I support the Objective but believe that PC1 compromises achievement of this Objective	<p>The reasons for this are:</p> <p>The Objective states " ... protection of water quality in each sub catchment and Freshwater Mgt Unit".</p> <p><b>The PC1 proposal</b> goes for the same approach across all parts of the greater Waikato/Waipā catchment (although currently excludes the Hauraki Area which seems strange) <b>without really identifying hot spots/sub catchment issues</b> in the first instance.</p> <p>This is seen in the Freshwater Mgt Unit tables – Table 3.11.1:</p> <ul style="list-style-type: none"> <li>- There is no current state information provided (which is not acceptable – and I have been waiting over two weeks for this information – I have been told it is being put together. Does this mean it is not available or the information does not link with the Plan so WRC are not sharing it)</li> <li>- The short term target for most areas is the same as the 80 year target. PC1 is promoted as 10 year step to the 80 year vision. So based on these tables most</li> </ul>	<p>I seek that the provision is:</p> <p>That rules being proposed are amended to match this objective – there is a sub catchment approach taken.</p>

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		<p>areas are being asked to achieve the 80 vision in the "Short term" – this would appear to against the how the Plan is being promoted</p>	
Objective 2	<p>I support the Objective but believe that PC1 compromises achievement of this Objective</p>	<p>However I believe that <b>the proposed rules of PC1 put at risk maintaining the "Social, economic and cultural wellbeing"</b> in the long term</p> <p>This is because of their wide ranging nature and not targeting key areas, and the speed of implementation</p>	<p>I seek that the provision is:</p> <p>That rules being proposed are amended to match this objective – there is a targeted sub catchment approach taken, and as more information is shared by the Council and understood by all parts of the community then wider rules can be brought in if required</p>
Objective 3	<p>I support the Objective but believe that PC1 compromises achievement of this Objective</p>	<p>Again PC1 does not just go for short term improvements.</p> <p>As noted above it does not share the current state, many short term targets are the same as the 80 year targets so PC1 is not just about the "first stage"</p>	<p>I seek that the provision is:</p> <p>That rules being proposed are amended to match this objective – there is a targeted sub catchment approach taken, and as more information is shared by the Council</p>

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			and understood by all parts of the community then wider rules can be brought in if required
Objective 4	I support	As above – PC1 in its current form does not take these Objective into enough consideration	As above
Throughout PC1 – Stock Exclusion definition – does not include sheep	I support this assumption	Fencing for sheep exclusion in hill country especially would be impractical. It would cause combination of productive land lost from farming and/or cattle being farmed on land best suited for sheep and more erosion possibly caused	Maintain current description of stock classes when considering "stock exclusion" (although I disagree with the required level of stock exclusion in hill country)
3.11.4.3 – Farm Environment Plans	I support that operations have plans  I do not support that farmers need to have certified professionals produce these plans	Farmers know their properties, needing certified professionals adds another layer of cost, time and complexity	WRC provides guidelines for the Farmers to produce plans and allows the farmers to produce and submit these plans.  The plans should not be books – the bigger the book the more it will get ignored – identify priorities and work on them.

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3.11.4.5 – Sub Catchment Planning	I support	This should be the major focus of PC1	
3.11.4.10	I support	This is needed already – is this saying this information is not available even though rules are being made.	The PC1 Proposal should be submitted with information of current state so there is greater understanding of what is being asked.
3.11.5.1	I support the concept but believe the criteria are too low	This will be bureaucratic nightmare. People still have to operate to some rules so sample audits can be undertaken	Minimum size lifted – would like to say 57ha but say 20.0ha to link with 3.11.5.2  Minimum stocking rate lifted – 10.0su and you need to clarify how the stock units will be calculated.

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3.11.5.2	I support but believe more operations should be able to fit in this criteria	These operations are unlikely to cause major problems.  However the rules of eligibility are too tight	Can include cropping, other points reviewed and more operations fit in here
3.11.5.3 (and probably 3.11.5.4,	I support farming remaining a permitted activity but believe the rules are too tight too quick	This is a huge change for the whole agricultural industry – there are a lot of aspects to consider and build knowledge around in all parts of the industry	Either timeframes lengthened, or  Criteria of permitted activity status are relaxed  (Sorry but don't have more definitive request)
3.11.5.7	I don't support the restriction on land use change	If all other rules happen to stay (Nitrogen cap, stock exclusion, and FEP's) if a farm wants to change the farming activity (small or big) and can stay within the existing criteria associated with the land he owns then any Land Use change should be a Permitted Activity	Land Use change permitted activity if other rules adhered too.  Farmer should be able to do this across any land that is owned – call it "bulk funding" and achieve and overall "net effect"

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Schedule A Registration	I support the concept but do not support the detail	<p>WRC have information on file now – they should use it to standardize information – e.g. they have access to farm maps and water body locations</p> <p>Listing animals and their grazing areas by type will create confusion</p> <p>Registration should be open as soon rules are passed to give maximum time but not before rules are passed</p>	<p>WRC should have a website portal where Farmers can register into standard form and all maps should be able to be accessed on that portal so WRC get the right data</p>
Schedule B – Nitrogen Reference Point	Not fully supported	<p>Cap for sheep and beef of the 14/15 and 15/16 years is not supported. The first year was on back of 3 dry summers in a row. Farm operations were still in recovery stage and so stock numbers were down and/or stock was sold earlier than normal.</p> <p>Dairy farmers were on back of high payouts and had high stock numbers and were still buying in feed.</p> <p>Nitrogen caps in areas where sediment issues more important does not seem appropriate</p> <p>NRP's (or Nitrogen foot prints) are very sensitive to cropping. If caps applied to 14/15 there is no ability to crop to meet challenges of climate warming and also the NZ Govt's objective of</p>	<p>Sheep and Beef operations are not capped at 14/15 or 15/16.</p> <p>Possible option is best of those years times a factor – e.g. plus 40% above those years</p> <p>There needs to be allowance for improvements in measuring output of nitrogen – in the waterways – not just Overseer</p>

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		increasing value of Primary exports by moving to higher value – this needs ability to supply all year round – not just the common time of Jan to March. Need crops to move into the shoulders	
<i>Schedule C – Stock Exclusion</i>	Partial Support	<p>Definition of water body is unclear</p> <p>The potential fencing requirements on sheep and beef hill country is impractical</p> <p>Time farms are too short</p> <p>Issue of sheep discussed previously</p> <p>Provision of water troughs generally means stock stay out these areas anyway. However nature of the land also means water reticulation schemes have issues – if this happens and all waterways are fenced this could cause animal welfare issue in that emergency situation</p>	Clarity is required on waterway definition is required and the if it is clear now it needs to be relaxed for bigger waterways and/or time available (even in Priority 1 areas)
<i>Schedule 1 Requirements for Farm Environment Plans</i>	I partially support	The amount and volume of detail required is too large in the short time required.	A stepped approach should be developed considering amount of detail and the key risk areas. Farmers should be able to prepare these plans

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		The approach of high detailed requirements and professional involvement will not assist the outcomes desired by these plans	to help increased ownership of the outcomes. Stepped approach means identifying and working selected high risk areas and then resubmitting some more detail 3 to 5 years later. This should be a working document.

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